

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b> <hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Martha Underwood, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-06162</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

1) Materials

Dr. Scott Guelcher (adoption of previously served report)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

2) Materials

Dr. Jimmy Mays (adoption of previously served report)  
Department of Chemistry  
University of Tennessee at Knoxville  
655 Buehler Hall  
Knoxville, TN 37996

3) Urologist

Dr. Jerry Blaivas (adoption of previously served report)  
445 East 77th Street  
New York, NY 10075

4) Pathologist (Specific Causation and Pathology)

Dr. Vlad Iakovlev, M.D.  
St. Michael's Hospital, Division of Pathology  
30 Bond Street, Cardinal Carter, Room 2-093  
Toronto, ON, M5B1W8  
Canada

5) Case-Specific Urogynecologist (Specific Causation)

Christopher Walker, MD, FACOG, FICS, FPMRS  
Urogyn Specialists of Florida  
801 N Orange Avenue, Suite 710  
Orlando, FL 32801

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude at trial evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling applicable to the trial of Plaintiffs' case, Plaintiffs reserve the right to designate a General Regulatory Expert. In that event, in order to comply with the Court's five-expert witness limitation, Plaintiffs would withdraw their designation of one of the five experts designated above and would instead designate:

Peggy Pence (adoption of previously served report)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

**NON-RETAINED EXPERT WITNESSES**

NAME	ADDRESS	SPECIALTY
Dr. Joseph Buscema	603 N. Wilmot Rd., #151 Tucson, AZ 85711	Obstetrics & Gynecology;

		Gynecologic Oncology
Dr. Alton Hallum, III	1845 W. Orange Grove Rd. Building 2 Tucson, AZ 85704	Obstetrics & Gynecology;
Dr. Kenneth Hatch	1501 N. Campbell Ave. Tucson, AZ 85724	Obstetrics & Gynecology; Gynecologic Oncology

A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22<sup>nd</sup> day of May, 2017.

/s John J. Foley  
John J. Foley  
SIMMONS HANLY CONROY  
One Court Street  
Alton, Illinois 62002  
Phone: (618) 259-2222  
Fax: (618) 259-2251  
jfoley@simmonsfirm.com  
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b> <hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Gloria Friberg, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-06500</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

1) Materials

Dr. Scott Guelcher (adoption of previously served report)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

2) Materials

Dr. Jimmy Mays (adoption of previously served report)  
Department of Chemistry  
University of Tennessee at Knoxville  
655 Buehler Hall  
Knoxville, TN 37996

3) Urologist

Dr. Jerry Blaivas (adoption of previously served report)  
445 East 77th Street  
New York, NY 10075

4) Urologist

Dr. Daniel Elliott (adoption of previously served report)  
Mayo Clinic  
200 1st Street SW  
Rochester, MN 55902

5) Case-Specific Urogynecologist (Specific Causation)

Christopher Walker, MD, FACOG, FICS, FPMRS  
Urogyn Specialists of Florida  
801 N Orange Avenue, Suite 710  
Orlando, FL 32801

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude at trial evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling applicable to the trial of Plaintiffs' case, Plaintiffs reserve the right to designate a General Regulatory Expert. In that event, in order to comply with the Court's five-expert witness limitation, Plaintiffs would withdraw their designation of one of the five experts designated above and would instead designate:

Peggy Pence (adoption of previously served report)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

**NON-RETAINED EXPERT WITNESSES**

NAME	ADDRESS	SPECIALTY
Dr. Samuel Lentz	Wake Forest Baptist Health Medical Center Blvd. Winston Salem, NC 27157	Obstetrics & Gynecology; Female Pelvic Medicine and

		Reconstructive Surgery; Gynecologic Oncology
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A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22<sup>nd</sup> day of May, 2017.

/s John J. Foley  
John J. Foley  
SIMMONS HANLY CONROY  
One Court Street  
Alton, Illinois 62002  
Phone: (618) 259-2222  
Fax: (618) 259-2251  
jfoley@simmonsfirm.com  
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b> <hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Lela Harrison, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-06160</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

1) Materials

Dr. Scott Guelcher (adoption of previously served report)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

2) Materials

Dr. Jimmy Mays (adoption of previously served report)  
Department of Chemistry  
University of Tennessee at Knoxville  
655 Buehler Hall  
Knoxville, TN 37996

3) Urologist

Dr. Jerry Blaivas (adoption of previously served report)  
445 East 77th Street  
New York, NY 10075

4) Urologist

Dr. Daniel Elliott (adoption of previously served report)  
Mayo Clinic  
200 1st Street SW  
Rochester, MN 55902

5) Case-Specific Urogynecologist (Specific Causation)

Christopher Walker, MD, FACOG, FICS, FPMRS  
Urogyn Specialists of Florida  
801 N Orange Avenue, Suite 710  
Orlando, FL 32801

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude at trial evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling applicable to the trial of Plaintiffs' case, Plaintiffs reserve the right to designate a General Regulatory Expert. In that event, in order to comply with the Court's five-expert witness limitation, Plaintiffs would withdraw their designation of one of the five experts designated above and would instead designate:

Peggy Pence (adoption of previously served report)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

**NON-RETAINED EXPERT WITNESSES**

NAME	ADDRESS	SPECIALTY
Dr. Eric Hall	2006 Moores Lane Texarkana, TX 75503	Obstetrics & Gynecology
Dr. Joseph Womack	1902 Moores Ln., Ste. A	Urology



	Texarkana, TX 75503	
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A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22<sup>nd</sup> day of May, 2017.

/s John J. Foley  
 John J. Foley  
 SIMMONS HANLY CONROY  
 One Court Street  
 Alton, Illinois 62002  
 Phone: (618) 259-2222  
 Fax: (618) 259-2251  
 jfoley@simmonsfirm.com  
 Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b> <hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Iris Jennings, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-06217</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

1) General Urogynecologist

Dr. Bruce Rosenzweig (adoption of previously served report)  
Rush University Professional Building  
1725 West Harrison Street, Suite 358  
Chicago, IL 60612

2) Materials

Dr. Scott Guelcher (adoption of previously served report)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

3) Materials

Dr. Jimmy Mays (adoption of previously served report)  
Department of Chemistry  
University of Tennessee at Knoxville  
655 Buehler Hall  
Knoxville, TN 37996

4) Urologist

Dr. Jerry Blaivas (adoption of previously served report)  
445 East 77th Street  
New York, NY 10075

5) Case-Specific Urogynecologist (Specific Causation)

Christopher Walker, MD, FACOG, FICS, FPMRS  
Urogyn Specialists of Florida  
801 N Orange Avenue, Suite 710  
Orlando, FL 32801

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude at trial evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling applicable to the trial of Plaintiffs' case, Plaintiffs reserve the right to designate a General Regulatory Expert. In that event, in order to comply with the Court's five-expert witness limitation, Plaintiffs would withdraw their designation of one of the five experts designated above and would instead designate:

Peggy Pence (adoption of previously served report)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

**NON-RETAINED EXPERT WITNESSES**

NAME	ADDRESS	SPECIALTY
Dr. Kenneth Fitzpatrick	9115 Old Fern Hill Rd. Bldg. B, Suite 202	Urology

	West Chester, PA 19380	
Dr. James Bollinger	209 W. Lancaster Ave., #200 Paoli, PA 19301	Urology

A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22<sup>nd</sup> day of May, 2017.

/s John J. Foley  
John J. Foley  
SIMMONS HANLY CONROY  
One Court Street  
Alton, Illinois 62002  
Phone: (618) 259-2222  
Fax: (618) 259-2251  
jfoley@simmonsfirm.com  
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b> <hr/> <b>THIS DOCUMENT RELATES TO:</b>  <i>Patricia Bell, et al. v. Ethicon, Inc., et al.</i> <b>Case No. 2:12-cv-06750</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

1) Materials

Dr. Scott Guelcher (adoption of previously served report)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

2) Materials

Dr. Jimmy Mays (adoption of previously served report)  
Department of Chemistry  
University of Tennessee at Knoxville  
655 Buehler Hall  
Knoxville, TN 37996

3) Urologist

Dr. Jerry Blaivas (adoption of previously served report)  
445 East 77th Street  
New York, NY 10075

4) Urologist

Dr. Daniel Elliott (adoption of previously served report)  
Mayo Clinic  
200 1st Street SW  
Rochester, MN 55902

5) Case-Specific Urogynecologist (Specific Causation)

Christopher Walker, MD, FACOG, FICS, FPMRS  
Urogyn Specialists of Florida  
801 N Orange Avenue, Suite 710  
Orlando, FL 32801

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude at trial evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling applicable to the trial of Plaintiffs' case, Plaintiffs reserve the right to designate a General Regulatory Expert. In that event, in order to comply with the Court's five-expert witness limitation, Plaintiffs would withdraw their designation of one of the five experts designated above and would instead designate:

Peggy Pence (adoption of previously served report)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

**NON-RETAINED EXPERT WITNESSES**

NAME	ADDRESS	SPECIALTY
Dr. Jennifer Elliott	Women's Health Associates 980 Johnson Ferry Rd. NE, Ste. 720 Atlanta, GA 30342	Obstetrics & Gynecology

Dr. James Dorchak	Columbus Regional OBGYN 1538 13 <sup>th</sup> Ave., # B250 Columbus, GA 31901	Obstetrics & Gynecology
Dr. James Cullison	West Georgia Urology 130 Clinic Ave., #202 Carrollton, GA 30117	Female Pelvic Medicine & Reconstructive Surgery; Urology
Dr. Kelly Dopson	1457 Garmon Ferry Rd. Atlanta, GA 30327	Obstetrics & Gynecology; Female Pelvic Medicine & Reconstructive Surgery

A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22<sup>nd</sup> day of May, 2017.

/s John J. Foley  
John J. Foley  
SIMMONS HANLY CONROY  
One Court Street  
Alton, Illinois 62002  
Phone: (618) 259-2222  
Fax: (618) 259-2251  
jfoley@simmonsfirm.com  
*Attorney for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

No. 2-10-MD-02327

TERESA PHELPS

*Plaintiffs,*

v.

CIVIL ACTION: 2:12-cv-05790

JOHNSON & JOHNSON,  
ETHICON, INC., ETHICON WOMEN'S  
HEALTH AND UROLOGY, a Division of  
Ethicon, Inc., and GYNECARE,

*Defendants.*

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**PLAINTIFF TERESA PHELPS' DESIGNATION AND DISCLOSURE OF  
GENERAL AND CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to PTO 248 and Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiff Teresa Phelps ("Plaintiff") submits the following Designation and Disclosure of Expert Witnesses and persons who may provide expert testimony pursuant to Rule 702 of the Federal Rules of Evidence. Plaintiff reserves the right to elicit testimony, either through direct examination or cross-examination, of all witnesses designated or identified by Plaintiff or Defendants as an expert or person with specialized knowledge, training, or experience. Plaintiff further reserves the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.



**RETAINED EXPERTS**

**1) Christopher Walker, MD (Urogynecologist)**

*Specific Causation Expert*

Urogyn Specialists of Florida

6464 Lake Burden View Dr.

Windermere, FL 34786

Plaintiff refers Defendants to Dr. Walker's Expert Report, served simultaneously with this disclosure, and all subparts and attachments thereto, which sets forth his opinions and the reasons and bases for them. Dr. Walker's Expert Report and corresponding attachments set forth the facts, data and information considered by Dr. Walker, the exhibits that Dr. Walker may use to support his opinions, and Dr. Walker's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Walker's Expert Report and all subparts and attachments thereto.

**2) Bruce A. Rosenzweig, MD (Urogynecologist) (adoption of previously served report)**

*General Causation Expert*

Department of Obstetrics and Gynecology

Rush University Medical Center

1725 West Harrison Street, Ste. 358

Chicago, IL 60612

Plaintiff refers Defendants to Dr. Rosenzweig's Expert Report(s), which is being served by way of separate e-mail from Plaintiff's MDL leadership, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. Dr. Rosenzweig's Expert Report(s) and corresponding attachments set forth the facts, data and information considered by Dr. Rosenzweig, the exhibits that Dr. Rosenzweig may use to support his opinions, and Dr. Rosenzweig's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Rosenzweig's Expert Report(s) and all subparts and attachments thereto.

- 3) **Dr. Daniel Elliott (Urologist)** (adoption of previously served report)  
*General Causation Expert*  
Mayo Clinic 200 1st Street SW  
Rochester, MN 55902

Plaintiff refers Defendants to Dr. Elliott's Expert Report(s), served by way of separate e-mail from Plaintiff's MDL leadership, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. Dr. Elliott's Expert Report(s) and corresponding attachments set forth the facts, data and information considered by Dr. Elliott, the exhibits that Dr. Elliott may use to support his opinions, and Dr. Elliott's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Elliott's Expert Report(s) and all subparts and attachments thereto.

- 4) **Dr. Howard Jordi (Materials)** (adoption of previously served report)  
*General Causation Expert*  
Jordi Labs 200 Gilbert Street  
Mansfield, MA 02048

Plaintiff refers Defendants to Dr. Jordi's Expert Report(s), served by way of separate e-mail from Plaintiff's MDL leadership, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. Dr. Jordi's Expert Report(s) and corresponding attachments set forth the facts, data and information considered by Dr. Jordi, the exhibits that Dr. Jordi may use to support his opinions, and Dr. Jordi's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Jordi's Expert Report(s) and all subparts and attachments thereto.

- 5) **Dr. Scott Guelcher (Materials)** (adoption of previously served report)  
*General Causation Expert*  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

Plaintiff refers Defendants to Dr. Guelcher's Expert Report(s), served by way of separate e-mail from Plaintiff's MDL leadership, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. Dr. Guelcher's Expert Report(s) and corresponding attachments set forth the facts, data and information considered by Dr. Guelcher, the exhibits that Dr. Guelcher may use to support his opinions, and Dr. Guelcher's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Guelcher's Expert Report(s) and all subparts and attachments thereto.

### **GENERAL RETAINED REGULATORY EXPERTS**

Plaintiff recognizes that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling, Plaintiffs reserve the right to designate the following General Regulatory Expert:

- 1) **Dr. Peggy Pence (Regulatory)** (adoption of previously served report)  
Symbion Research International, Inc. 3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

Plaintiff refers Defendants to Dr. Pence's Expert Report(s), served by way of separate e-mail from Plaintiff's MDL leadership, and all subparts and attachments thereto which sets forth her opinions and the reasons and bases for them. Dr. Pence's Expert Report(s) and corresponding attachments set forth the facts, data and information considered by Dr. Pence, the exhibits that Dr. Pence may use to support her opinions, and Dr. Pence's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Pence's Expert Report(s) and all subparts and attachments thereto.

### **NON-RETAINED EXPERTS**

<b>NAME</b>	<b>ADDRESS</b>	<b>SPECIALITY</b>
Dr. Timothy Whittle	747 Medical Center Dr. West Point, MS 39773	OBGYN
Dr. Edmund Miller	830 Medical Center Dr.	Internal

	West Point, MS 39773	
Dr. Mark Burtman	294 Chubby Dr. 2 Columbus, MS 39705	OBGYN
Dr. John Cox	835 Medical Center Dr. West Point, MS 39773	Nephrology/Internal

A General Designation and Disclosure has been or is being served by and on behalf of the Wave 5 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

Respectfully submitted this 22nd day of May 2017,

**ROBINS CLOUD LLP**

/s/ Alex Barlow

Alex Barlow

barlow@robinscloud.com

Texas Bar No. 24006798

Rebecca Phillips

rphillips@robinscloud.com

Texas Bar No. 24079136

2000 West Loop South, Suite 2200

Houston, TX 77027

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that the above has been served on counsel for Defendants via electronic mail this the 22nd day of May 2017.

**BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC**

Christy D. Jones  
christy.jones@butlersnow.com  
William Gage  
william.gage@butlersnow.com  
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Ashley.Stubbs@butlersnow.com  
1020 Highland Colony Parkway  
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P.O. Box 6010  
Ridgeland, MS 39158-6010

**THOMAS, COMBS & SPANN, PLLC**

David B. Thomas  
dthomas@tcspllc.com  
300 Summers Street, Suite 1380  
P.O. Box 3824  
Charleston, WV 25338-3824

**COUNSEL FOR DEFENDANTS**

Respectfully submitted,

**ROBINS CLOUD LLP**

/s/ Alex Barlow

Alex Barlow  
barlow@robinscloud.com  
Texas Bar No. 24006798  
Rebecca Phillips  
rphillips@robinscloud.com  
Texas Bar No. 24079136  
2000 West Loop South, Suite 2200  
Houston, TX 77027

**COUNSEL FOR PLAINTIFF**